REMARKS

Claims 1, 7, 8, 14, 15 and 21-27 are pending in the above-identified application. Claims 1, 7, 8, 14, 15, and 21-27 were rejected. With this Response, no claims are added, canceled, or amended. Accordingly, claims 1, 7, 8, 14, 15, and 21-27 are at issue in the above-identified application.

I.   35 U.S.C. §102 Anticipation Rejection of Claims

Currently pending claims 1, 8, and 15 were rejected under 35 U.S.C §102(b) as being anticipated by *Person et al.* ("Special Edition Using Microsoft(R) Word 97," 1997, hereinafter *"Person"*). Applicants respectfully traverse this rejection and request reconsideration.

"A claim is anticipated only if each and every element as set forth in the claim is found either expressly or inherently, in a single prior art reference." MPEP §2131.

Person fails to teach every limitation of claim 1, and therefore cannot anticipate claim 1. For example, *Person* fails to teach "storing a set of styles associated with a word processing document <u>in a first record</u> wherein the set of styles comprises a paragraph style gallery and a text style gallery; and <u>storing in one or more second records a set of text information</u> associated with said word processing document, and a set of information <u>linking said set of text information and said set of styles</u>" (emphasis added). Applicants previously argued that *Person* contains no discussion of how the style templates and text are stored, and certainly does not disclose the records and linking information in accordance with the present claims. See *Person*, p. 16-18. In fact, *Person* does even mention a storing step. Accordingly, *Person* neither expressly nor inherently teaches these elements, and therefore does not anticipate claim 1.

In response, the Examiner argues that *Person* discloses two types of styles that apply to text, character, and paragraph styles, and that both character and paragraph styles are associated with text. Regardless of whether those assertions are true, neither rebuts Applicants' argument that *Person* fails to teach a first record and one or more second records, the first record storing style information and the one or more second records storing text information. As previously stated, *Person* contains no discussion of how the style templates and text are stored, and certainly does not disclose the records and linking information in accordance with the present claims. Applicants respectfully submit that the Examiner is reading into *Person* teachings that simply are not there. Claims cannot be rejected based on a presumed inherency unsupported by reference or ordinary skill in the art.

Accordingly, *Person* fails to anticipate claim 1. Claims 8 and 15 are not anticipated by *Person* for at least the same reasons that claim 1 is not anticipated by *Person*.

Regarding claim 22, *Person* fails to teach "storing the set of styles associated with the word processing document includes extracting the set of styles from the word processing document." The Examiner asserts that this limitation is taught by *Person* at pages 12 and 16. The Examiner contends that "the document associates styles with characters in paragraphs. The style applied to a selected paragraph is associated with the paragraph, and they are stored when a document is saved." However, Applicants fail to see how the Examiner's assertions relate to the limitation "extracting the set of styles from the word processing document." *Person* does not disclose extracting styles from a word processing document. Associating a style with a document and extracting a style from a document are entirely different. See, *e.g.*, page 14, lines 4-10 of the patent application. Accordingly, claim 22 is not anticipated by *Person*. Claims 24

and 26 are not anticipated by *Person* for at least the same reasons. Accordingly, the rejection

should be withdrawn.

II.   35 U.S.C. § 103 Obviousness Rejection of Claims

Claims 23, 25, and 27 were rejected under 35 U.S.C. § 103(a) as being unpatentable over

Person in view of *Tan et al.* (U.S. Pat. No. 6,078,920). Applicants respectfully traverse this

rejection. The rejection of claims 23, 25, and 27 rely on the assertion that *Person* teaches every

limitation of claim 1, 8, and 15. As previously explained, that assertion is erroneous and thus the

rejections should be withdrawn.

III. Conclusion

In view of the above remarks, Applicants submit that all claims are allowable over the

cited prior art, and respectfully requests early and favorable notification to that effect.

Respectfully submitted,

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